

Sage Legal LLC

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December 12, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Peggy Kuo, U.S.M.J.
225 Cadman Plaza East
Courtroom 11C South
Brooklyn, NY 11201-1804

Re: Shkolir, et al. v. Rx2Go, Inc., et ano.

Case No.: 1:23-cv-7256 (OEM) (PK)

Dear Judge Kuo:

This firm represents the Defendants in the above-referenced case, who write to respectfully request an adjournment of the telephonic pre-motion conference. See Text Only Order dated December 11, 2024.

Pursuant to ¶ IV(B) of this Court's Individual Practice Rules, Defendants respectfully submit that:

(i) the appearance is currently scheduled to proceed at 10:00 AM on Tuesday, December 17, 2024;

(ii) the reason for the request is because your undersigned will be out of the country with uncertainty as to the ability to make calls, and it will be 8:00 PM where your undersigned will be at 10:00 AM EST;

(iii) there have been no previous requests for an adjournment of this conference;

(iv) Plaintiffs consent to this request and, having met and conferred on the subject, the parties propose the following alternative mutually available dates: (i) December 24, 2024 in the afternoon; (ii) December 26, 2024; (iii) December 27, 2024; (iv) January 2, 2024 (except between noon and 2:00 PM); (v) January 3, 2024 (except between 3:00 PM and 3:30 PM); (vi) January 6, 2024 (except between 3:00 PM and 5:00 PM); and (vii) January 7, 2024 (except between 12:30 PM and 1:30 PM); and

(v) the requested extension should not affect any other scheduled dates or deadlines.

Based on the foregoing, Defendants respectfully submit that there exists good cause such that this Court should exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A).

Defendants thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
December 12, 2024

Respectfully submitted,

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.
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